UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

LEMOND CYCLING, INC.,

Plaintiff,

Case No. 08-CV-1010 (RHK-JSM)

٧.

TREK BICYCLE CORPORATION,

Defendant and Third-Party Plaintiff,

٧.

GREG LEMOND,

Third-Party Defendant.

TREK'S NOTICE OF MOTION FOR PROTECTIVE ORDER

TO: LEMOND CYCLING INC., AND ITS ATTORNEYS, CHRISTOPHER MADEL AND DENISE RAHNE, ROBINS KAPLAN MILLER & CIRESI LLP, 800 LASALLE AVENUE, SUITE 2800, MINNEAPOLIS, MN 55402-2015.

Please take notice that Trek Bicycle Corporation is filing its Motion for Protective Order in the above-captioned action and will bring the matter for hearing before the United States District Court for the District of Minnesota, Honorable Janie S. Mayeron presiding, at the Saint Paul Federal Courthouse, 316 North Robert Street, Suite 632 Courtroom 6B, St. Paul, MN 55101, on May 19, 2009, at 4:00 p.m.

Dated this 30th day of April, 2009

HALLELAND LEWIS NILAN & JOHNSON, P.A.

By: s/Benjamin J. Rolf

Erik T. Salveson (Reg. No. 177969) Amanda M. Cialkowski (Reg. No. 306514) Benjamin J. Rolf (Reg. No. 386413) 600 U.S. Bank Plaza South 220 South Sixth Street Minneapolis, MN 55402 Telephone (612) 338-1838 Fax: (612) 338-7858

and

Ralph A. Weber (State Bar No. 1001563) Christopher P. Dombrowicki (State Bar No. 1041764) Kristal S. Stippich (State Bar No. 1061028) GASS WEBER MULLINS, LLC 309 North Water Street, Suite 700 Milwaukee, WI 53202 Telephone: (414) 223-3300

Fax: (414) 224-6116

Email: weber@gasswebermullins.com dombrowicki@gasswebermullins.com stippich@gasswebermullins.com

ATTORNEYS FOR DEFENDANT AND THIRD-PARTY PLAINTIFF TREK BICYCLE CORPORATION